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*Application *pro hac vice* pending

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03070-JD

**PLAINTIFFS' MOTION FOR
ADMINISTRATIVE RELIEF TO
EXCEED PAGE LIMITATION FOR
MEMORANDUM IN SUPPORT OF
EX PARTE MOTION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE**

1 Plaintiffs American Federation of Government Employees, AFL-CIO, *et al.*, hereby
2 respectfully submit this Motion for Administrative Relief, pursuant to Civil Local Rule 7-11, to
3 exceed the 15-page limit set forth in this Court's Standing Order for Civil Cases for Plaintiffs'
4 Memorandum in Support of *Ex Parte* Motion for Temporary Restraining Order and Order to Show
5 Cause, which is being filed today. Plaintiffs recognize that a request of this type is disfavored, but
6 due to the extraordinary circumstances of this case and the nature of the relief sought, Plaintiffs
7 respectfully request an additional twenty-four (24) pages for their memorandum. Plaintiffs have
8 been unable to reach counsel for Defendants to determine if they will stipulate to the requested
9 relief.

10 In support of their request, Plaintiffs provide the following showing of good cause.

11 1. Plaintiffs' *Ex Parte* Motion for Temporary Restraining Order involves
12 constitutional and statutory claims in a case of national importance involving an Executive Order
13 issued the night of March 27, 2025, as well as extensive evidence of irreparable harm, the standing
14 of six different plaintiff organizations, and other factual and equitable issues.

15 2. Plaintiffs have been diligent in drafting their motion and supporting papers in
16 conformity with the format and content mandated by the Court and have attempted to shorten the
17 length of the brief as much as possible. Plaintiffs have also been working as swiftly as possible to
18 present these issues to the Court due to the far-reaching, and for some Plaintiffs existential, effects
19 of the Executive Order. Plaintiffs require an additional twenty-four (24) pages in order to fully
20 address the complex factual and legal background for the Court, particularly given the rapidly
21 developing factual circumstances.

22 3. It was not possible to reach Defendants to seek their consent to this motion. The
23 Complaint was filed on the evening of April 3, 2025. In order to provide notice of this action to
24 the Defendants, Plaintiffs served a copy of the filed complaint through a process server to the U.S.
25 Attorney's Office on April 4, 2025. On April 6, 2025 Plaintiffs' counsel notified Patrick Robbins,
26 Acting U.S. Attorney for the Northern District of California, and Pamela Johnson, Chief of the
27 Civil Division of the U.S. Attorney's office for the Northern District of California, by email of
28 Plaintiffs' intention to file their motion for temporary restraining order and to seek leave to file

1 excess pages. Declaration of Anne Weis in Support of Plaintiffs' Application for Temporary
 2 Restraining Order ¶¶ 2-3. None of the U.S. Department of Justice attorneys contacted have
 3 responded as of the filing of this Motion. *Id.* ¶ 3. Thus, a stipulation to the present motion could
 4 not be obtained from opposing counsel. *Id.*

5 On the basis of the foregoing showing of good cause, Plaintiffs respectfully request this
 6 Court to permit them to file the accompanying Memorandum in support of the *Ex Parte* Motion
 7 for Temporary Restraining Order and Order to Show Cause.

8 Respectfully submitted,

9 DATED: April 7, 2025

10 /s/ Leon Dayan
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